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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

DR. SHAUN L. W. SAMUELS,

Plaintiff,

VS.

TRIVASCULAR, INC.,

Defendant.

CASE NO. 3:13-CV-02261-EMC

**STIPULATION AND
[PROPOSED] ORDER
GRANTING EXTENSION OF
TIME TO RESPOND TO FIRST
AMENDED COMPLAINT**

TRIVASCULAR, INC.

Counter-Claimant,

VS.

DR. SHAUN L. W. SAMUELS,

Counter-Defendant.

The Plaintiff Shaun L.W. Samuels (“Samuels”), with leave of Court (Doc. No. 66), filed a First Amended Complaint against Defendant TriVascular, Inc. (“TriVascular”), and newly named individual Defendants Michael A. Chobotov, Robert G. Whirley, and Joseph W. Humphrey (“Named Individuals”) on July 20, 2015 (Doc. No. 68). In an effort to have a coordinated response, the parties are discussing the possibility of a coordinated response to the complaint.

1 IT IS HEREBY STIPULATED, by and between the parties, by and through their respective
2 attorneys of record, that TriVascular and the Named Individuals' pleadings in response to the First
3 Amended Complaint must be filed on or before August 20, 2015.

4 DATED: July 24, 2015

5 Respectfully submitted,

6 /s/ James D. Petrucci

7 James D. Petrucci (SBN 115175)
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14 Attorneys for Plaintiff
15 DR. SHAUN L.W. SAMUELS

16 DATED: July 24, 2015

17 Respectfully submitted,

18 /s/ Marc H. Cohen

19 Marc H. Cohen
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20 KIRKLAND & ELLIS LLP
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22 Attorneys for Defendants

1 **ATTESTATION OF CONCURRENCE IN FILING**

2 I, Marc H. Cohen, am the ECF User whose identification and password are being used to file
3 this Stipulation and [Proposed] Order Granting Extension of Time to Respond to First Amended
4 Complaint. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that James D. Petruzzi of The
5 Petruzzi Law Firm has concurred in this filing.

6 DATED: July 24, 2015

7 Respectfully submitted,

8 _____
9 /s/ Marc H. Cohen

10 Marc H. Cohen

11 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

12 July 28, 2015

13 DATED: _____



1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on July 24, 2015 a copy of the foregoing document is being
3 electronically filed with the Clerk of the United States District Court for the Northern District of
4 California by using the CM/ECF system, which will send notice of such filing to all counsel of
5 record.

6 DATED: July 24, 2015

/s/ Marc H. Cohen

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